

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JUANA SIERRA,

Plaintiff,

07 Civ. 6769 (JSR)

AFFIRMATION

- against -

CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF BUILDINGS, and PATRICIA
J. LANCASTER, in her capacity as
COMMISSIONER OF NEW YORK CITY
DEPARTMENT OF BUILDINGS; NEW
YORK CITY DEPARTMENT OF HOUSING
PRESERVATION AND DEVELOPMENT, and
SHAUN DONOVAN, in his capacity as
COMMISSIONER OF NEW YORK CITY
DEPARTMENT OF HOUSING PRESERVATION
AND DEVELOPMENT; and EMAD IBRAHEM.

Defendants.
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CHRISTOPHER SCHWARTZ, an attorney admitted to practice in the Courts of
the State of New York, hereby affirms, under penalty of perjury, that the following is
true:

1. I am a supervising attorney at MFY Legal Services, Inc., a not-for-profit agency that provides free legal services to low-income persons living in New York City.
2. As part of MFY Legal Services' comprehensive legal services for low-income New York City residents, our agency has a Neighborhood Preservation Project, which includes our East Side SRO Law Project. The East Side SRO Law Project provides free legal services to low-income tenants living in SRO units on the East Side of Manhattan and all of lower Manhattan below 14th Street. In addition to MFY Legal Services' SRO Law Project, other legal service agencies also provide legal services to SRO tenants in this area.

3. I have practiced in the area of housing law for over 5 years. Before becoming a supervising attorney, I was the staff attorney for the East Side SRO Law Project. During this time I have worked with our East Side SRO Law Project in providing representation to low-income tenants living in SRO units to preserve their homes.

4. I submit this affidavit to support Plaintiff Sierra's opposition to the City Defendant's motion to dismiss.

5. The SRO housing stock in New York City is considered housing of last resort for most of our clients. Without this housing, most of our clients would become homeless because they cannot afford the high rents of apartments in New York City. The majority of our clients living in SRO units have monthly rents below \$600.

6. While we do not have an official number of SRO units in the area that the East Side SRO Law Project serves, we have served approximately 130 individual SRO tenants each year for the past three years, not counting outreach, group representation, and other forms of advocacy.

7. The SRO housing stock is crucial to our low-income clients and their ability to find and maintain affordable housing in New York City.

WHEREFORE, I respectfully request that the relief sought herein be granted in all respects.

Dated: January 24, 2008
New York, New York



CHRISTOPHER SCHWARTZ